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William Britt
Superintendent

December 3, 2001

DOCKET FILE COPY ORIGINAL
Bienville Parish School Board
2019 Locust Street
POST OFFICE BOX 418
ARCADIA, LOUISIANA 71001

TELEPHONE
(318) 263-9416
(318) 263-2244
FAX
(318) 263-3100
(318) 263-9038

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DEC 05 2001

FCC MAIL ROOM

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington DC 20554

In the matter of: Request for Review by Bienville Parish School Board of Decision of
Universal Service Administrator.

Reference: FCC Docket No. 97-21
FCC Docket No. 96-45

Please accept this letter as a request for review of the appeal decision of the Universal Service
Administrator regarding:

USAC 471 Application Number 220710
Funding Request Numbers 573330, 573338, 573345, 573352, 573377

USAC 471 Application Number 226869
Funding Request Numbers 573440, 581265

The above applications and FRN requests have been denied based on the decision that the Form
471 "Block 6" signature page submitted was not the newly updated October, 2001 approved
form, but was the previous version of the signature page. We assert this issue is a minor
deviation which should not have caused the denial of all eligible discounts. In addition, we
assert that the USAC Administrator accepts or denies prior year Block 6 signature pages
inconsistently and request that the district not be penalized for an oversight that does not result in
consistent denial under USAC review.

The interest of the school in this matter is that of a Universal Service Fund applicant seeking
discount support for eligible services. The district has committed considerable resources to
provide equipment and services for students. Denial of continued Universal Service discounts
will cause severe hardship on the district.

The facts of the application are described in the following paragraphs and the attached SLD
Letter of Appeal dated August 23, 2001. The school applied for telcom and internet services.

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discounts under Application 220710 and internal connections equipment and services discounts under Application 226869 for Year 4 under the Universal Services program. The issue at hand is that the Block 6 signature form was changed in October, 2000 and the school had already obtained a copy of the Block 6 for which was later mailed to the USAC. The points on which we are requesting review are described in the following paragraphs.

The USAC changed the Block 6 form four months after the start of the funding year submission cycle. Under USAC rules, a school was allowed to begin the process of formulating an application as early as July 1, 2000 and then submit the application online when the filing window opened in November, 2000. In practice, many schools assemble the forms at the beginning of the school year and then complete and submit the forms during the window period. The particular case with this request is that the forms were printed and filed in with preliminary information during the early part of the school year. The USAC then made minor revisions to the Block 6 form in October, 2000. As the 470 advertisement period and 471 decisions were completed, the working application was key entered online. The Superintendent signed the working copy paper Block 6 form for submission. At least two people compared the form to the online printed Block 6 page, but neither noticed two minor additions. Over six months later, the SLD informed the district that neither application would be processed.

Individual applications should not be summarily disqualified when the USAC has changed requirements at such a late date. It is understandable that the USAC might require a revised Block 6 form as a part of Problem Resolution, but issues much more significant are allowed correction under the Naperville ruling and other Commission directives. It is inappropriate to dismiss an entire application under such circumstances. In addition, the filing window time period and six month response interval from the SLD preclude any opportunity for the school to provide any corrective action within a reasonable window.

Evidence is present showing that the SLD applies the October, 2000 Block 6 review in an inconsistent manner. We are aware of at least one other application that was not denied when the previous version Block 6 was submitted and another in particular (Tallulah Academy) where two Block 6 forms were submitted in the same envelope with one being accepted and one being rejected. The point to be recognized is that even the trained examiners of the SLD routinely confuse the changed forms or overlook inconsistencies.

Evidence is present showing the Block 6 form is only used to verify the identity of the applicant since the written Block 6 signature form is no longer required by the USAC as part of the application process. Applications will now be submitted simply by entering a PIN number to verify the identity of the applicant. This change is evidence that the submission of a 471 Application online is considered acceptance of all conditions enumerated in the online Block 6. The irony is that the SLD denies discounts for an applicant based on an obsolete form while it is eliminating that same form.

The changes in the October, 2000 revision of the Block 6 form are moot since all schools must comply with audit and documentation standards with any Federal program participation. The same assurances are required by the district when the 486 form is submitted. Although the new version and additional documentation provided by the form is not challenged, the information

and assurances are not significant enough to warrant denial of an application when a simple remedy is available.


The overriding goal of the Universal Services Fund is to provide universal access to all school children. The Commission has previously directed USAC to provide assistance in resolving issues that do not significantly impact the funding request and do not pose a significant administrative burden upon USAC. The district has sought to comply with the substantial administrative requirements of the program. Allowing the district to submit the updated Block 6 form will not add an undue burden on either party. A favorable review of this appeal is the only avenue for meeting the goals of the USF and charge of the Commission.

The relief sought by the school is that the Commission review the issue and allow corrections of a Block 6 form to be treated as Problem Resolution issue as opposed to Minimum Processing Standards when all other facets of the application are complete. Specifically, we request the Commission direct the USAC to allow the signed October, 2000 Block 6 form to be submitted as a Problem Resolution "additional information" correction. Commission guidelines may direct that the relief be adopted as allowance of an extension of time to file the completed 471. Under either relief, the Commission has declared in previous rulings that the totality of the application should be considered in accepting requests for funding, but must be weighed with the cost of administering the program. The USAC is charged with processing applications in a cost effective manner, but this type of correction is insignificant.

The fact that the USAC changed the form four months after the start of the processing year cycle has placed an additional administrative requirement on rural schools with limited staffing and resources. Based on the significance of the change and the burden on the school, it would seem more appropriate for USAC to permit a school to correct the discrepancy without suffering the full penalty of complete loss of all discounts. For these reasons, we request that the district application not be denied for processing as a Year 4 request.

Please feel free to contact me if you have any other questions or need additional information. We look forward to a favorable resolution from the Commission that will allow the children of Bienville Parish to continue moving forward.

Sincerely,



William Britt
Superintendent

Attachments:

- (1) Copy of Application 220710 and Application 226869
- (2) Original signature of Block 6 Form Application 220710 (Online Form Revised October, 2001)
- (3) Original signature of Block 6 Form Application 226869 (Online Form Revised October, 2001)

- (4) SLD Letter of August 2, 2001 (Form 471 Rejection Letter – App 220710 and 226869 with September 1999 Block 6 Forms)
- (4) Copy of Letter of Appeal to SLD – Application 220710 and 226869
- (5) SLD Letter of November 5, 2001 (Letter of Denial on Application 220710 and 226869)
- (6) References of FCC decisions which apply to these appeals.

ATTACHMENT 6 REFERENCES

The FCC has issued guidelines to the SLD that have changed and evolved over time to accommodate schools where possible. Recent FCC cases allow exceptions based on the public interest being best served by waiver of rules. Those cases can be summarized as:

Naperville Community Unit – The FCC held that Naperville did indeed submit an application with required information missing, but that the totality of circumstances did not warrant rejection. It was determined that (1) there was no evidence Naperville attempted to mislead the SLD, (2) the information was a “first time” request on a “revised” form, and (3) the information could be easily discerned and (4) the application was otherwise substantially complete. The tie to the current application cases is that the Block 6 form was changed four months after the start of the processing year and constituted a “revised form” that could have been misleading. The information is easily discerned and is no longer being required. The application was otherwise complete.

Mundelein Elementary Schools (et.al.) – The FCC held that the SLD did not uniformly apply the standards of correcting missing or incorrectly submitted 470 Application numbers. It was determined that there was no additional effort required to obtain a missing 470 Application number than it was to obtain a correction on a submitted 470 Application number, but the SLD would routinely reject an application with a missing 470 number. The FCC held that inconsistent processing should not be used to penalize applicants with missing information. The cases in point show that the SLD did inconsistently accept a September 2000 Block 6 form, but would then reject another Block 6 even within the same school application packet. (Tallulah Academy).

Lettie Jensen Library – The FCC held that an unreasonable time delay in response by the SLD had caused an application by the library to be excluded because the amended application was submitted after the deadline. This case shows that the FCC will hold the SLD responsible where timing actions cause an application to be denied. The issue for Bienville Parish is that the SLD changed the Block 6 four months after the start of the year, and then did not reply for six months after the incorrect form was submitted. Even if the application had been incorrectly submitted on the first day of processing, there would have been insufficient time for the district to re-submit the Block 6 form.

Northeast Cellular Telephone – The FCC and federal courts held that a Commission rule “*waiver is appropriate only if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule. A rule, therefore, may be waived where the particular facts make strict compliance inconsistent with the public interest*”. The issues in these applications are excellent examples where strict application of shifting rules is not in the public interest.



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Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 2001-2002

November 5, 2001

William Britt
Bienville Parish School Board
2019 Locust Street
Post Office Box 418
Arcadia, Louisiana 71001

Re: Billed Entity Number: 139293
471 Application Number: 226869
Funding Request Number(s): 573440, 581265
Your Correspondence Dated: August 23, 2001

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Four Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 30-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number: 573440, 581265

Decision on Appeal: **Denied in full**

Explanation:

- You have stated on appeal that an error has been made regarding the certification page that was submitted for this application. The error in this case is attributable to filing a portion of the 471 application on-line and the other parts of the application via hard copy. You have stated that the district began a paper working copy of the application and later entered the application on-line. While completing the hard copy application the September 1999 Form 471, Block 6, certification page, was completed and held for signature. The error had occurred when you had signed and mailed the hard copy block 6 page since that portion of the application was already completed, the form change was not detected. You have enclosed with the appeal, the correct OMB-approved FCC Form 471, Block 6, certification/signature page dated October 2000 in the lower right hand corner and you request that SLD waive the Minimum

Processing Standards to allow this revised form to be accepted and the submitted Form 471 application be processed and reviewed.

- After thorough review of the appeal, it was determined from the Form 471 application submitted that the incorrect OMB-approved FCC Form 471 (Block 6, Certifications and Signature page) has been used in Funding Year Four. The lower right hand corner of this form shows September 1999 instead of October 2000. This is the reason the application was rejected for failing Minimum Processing Standards in Funding Year 4. According to program rules the Form 471 is considered to be received when it has the required information necessary to pass Minimum Processing Standards. Since the Form 471, Block 6, Certifications and Signature page was not submitted on the correct OMB-approved FCC Form for Funding Year 4 (dated October 2000 in the lower right hand corner of the form) it was returned to you in accordance with program rules. It is also noted (with regards to your OMB-approved FCC Form 471, Block 6 page, dated October 2000 which was included with your appeal), that the Funding Year 4-window deadline for submitting all Form 471 applications was January 18, 2001. Consequently, the SLD will not consider the Form 471 application submitted for funding, and your appeal is denied in full.

If you believe there is a basis for further examination of your application, you may file an appeal with the Federal Communications Commission, Office of the Secretary, 445 12th Street, SW, Room TW-A325, Washington, DC 20554. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. Before preparing and submitting your appeal, please be sure to review the FCC rules concerning the filing of an appeal of an Administrator's Decision, which are posted on the website at <www.universalservice.org>. **You must file your appeal with the FCC no later than 30 days from the date on this letter for your appeal to be filed in a timely fashion.**

We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 2001-2002

November 5, 2001

William Britt
Bienville Parish School Board
2019 Locust Street
Post Office Box 418
Arcadia, Louisiana 71001

Re: Billed Entity Number: 139293
471 Application Number: 220710
Funding Request Number(s): 573330, 573338, 573345, 573352, 573377
Your Correspondence Dated: August 23, 2001

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your appeal of SLD's Year Four Funding Commitment Decision for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 30-day time period for appealing this decision to the Federal Communications Commission ("FCC"). If your letter of appeal included more than one Application Number, please note that for each application for which an appeal is submitted, a separate letter is sent.

Funding Request Number: 573330, 573338, 573345, 573352, 573377

Decision on Appeal: **Denied in full**

Explanation:

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We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

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LETTER OF APPEAL

SLD DECISION LETTER OF August 2, 2001

YEAR 4 - 471 APPLICATION 220710
APPLICANT FORM IDENTIFIER 007
FRN 573330, 573338, 573345, 573352, 573377

YEAR 4 - 471 APPLICATION 226869
APPLICANT FORM IDENTIFIER 007-IC
FRN 573440, 581265

August 23, 2001

Letter of Appeal
Schools and Libraries Division
Box 125--Correspondence Unit
80 South Jefferson Road
Whippany NJ 07981

Dear Administrator:

I received your letter dated August 2, 2001 indicating the entire FCC Form 471 *Certification of the Services and Certification Form* for the applications above did not meet Minimum Processing Standards and thus would not be processed. The letter stated the reason for rejection was that an incorrect Form 471 had been submitted. Specifically, the letter explained that the "1999" Form 471 Block 6 page was submitted instead of the October, "2000" Form 471 Block 6 page. The actual applications were filed online with just the signature page and school worksheet being mailed to the SLD.

While I appreciate the need for uniformity and the reduction of administrative cost by your agency, the only visible differences between the "1999" Form 471 and the "2000" Form 471 are the form being dated October 2000 and the addition of the following statements:

and if audited, will make available to the Administrator such records. *(Placed at the end of paragraph 32)*

The Americans with Disabilities Act, the individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities. *(Placed at the bottom of the form)*

While this information is important as to the responsibility of the applicant when providing the services, it does not alter or modify the required information being presented to the agency. As such, the agency has the necessary information on the 1999 Form 471 to process the request.

In a recent order issued by the Federal Communication Commission (*Naperville Community Unit FCC 01-73*), the Commission addressed the criteria for rejecting an application due to technical defects. The Commission adopted a totality of the circumstances approach when evaluating the rejection of an application. It based the evaluation method on several factors. One factor was that the form had changed and there was some uncertainty whether the applicants understood the impact of the change and the appropriate response. The second factor was

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whether the SLD could reasonably discern the necessary information from the application. The Commission noted that the majority of the information in the application was correct and the information missing could easily be discerned from the other information on the application. Under the totality of the circumstances' standard, the Commission held that the application should be reviewed.

The error in the present application is far less significant than the omission in the *Naperville* case. No information was omitted. The only error was that the correct required information was provided on a form that had been recently updated three months after the start of the processing year. As such, the agency had all the necessary information to evaluate the merits of the application. To reject the application solely because the 1999 Form 471 was used instead of the 2000 Form 471 (the information listed on both forms is essentially identical) is directly contrary to the guidelines set forth by the Commission in the *Naperville* case.

Furthermore, the district is already under an obligation to retain the records for audit purposes and to comply with the guidelines set forth in The American With Disabilities Act. Namely, before any discount funding can be released, a Form 486 must be completed. This form lists the same assurances that were added to the revised Form 471. As such, the District is aware of its obligations regarding these issues and will comply with those requirements.

The error in this case is attributable to filing a portion of the application on-line and the other parts of the application via hard copy. The district began a paper working copy of the application and later entered the application on-line. While completing the hard copy application, the 1999 Form 471 Block 6 page was completed and held for signature. Between the time the 1999 hard-copy Form 471 was begun and later submitted online, the revised Form 471 was issued. The on-line version of the 471 Block 6 was not printed at the time of my review since the operator understood that printing the Block 6 would automatically submit the entire application. The error occurred when I signed and mailed the previously prepared 1999 Block 6. Since that portion of the application was already completed, the form change was not detected.

While I appreciate that the SLD's rules and procedures, I would hope that form would not displace substance, especially when it comes to an error of this nature. It is my understanding that one of the goals of Universal Service is to provide technology assistance for educating rural children. It would be a harsh travesty to see a district's \$383,590 technology program canceled due to a minor clerical error.

Consolidated district applications require additional documentation, justification, and/or corrections of the 471 request after the 471 application has been accepted. Such correspondence is normally accepted by the SLD under the provision that the issue is a "Problem Resolution" clarification. The only burden upon the SLD would be to require an updated Block 6 page be submitted as other questions are addressed by the district.

Resolution of the issue involves only a single page substitution as all other information has been submitted for processing. I am therefore requesting that the SLD waive "Minimum Processing Standards" to allow the revised page of year "2000" Block 6 form be accepted as a Problem Resolution clarification.

I have enclosed the October, "2000" Form 471 pages. I respectfully request that the applications be reviewed and processed. Thank you for your consideration in this matter.

Sincerely,



William Britt
Superintendent

Attachments:

SLD Rejection Letter of August 2, 2001

Form 6 - 471 Certification page

Form 6 - 471 Attachments for Internet Access and Telecommunications

Entity Number 139293 Applicant's Form Identifier 007
 Contact Person Danny Gour Phone Number 318-263-9416

Block 6: Certifications and Signature

- 24 The entities listed in Block 4 of this application are eligible for support because they are: (Check one or both.)
- a ☒ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or
 - b ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools, including, but not limited to, elementary and secondary schools, colleges, or universities.
- 25 The eligible schools and libraries listed in Block 4 of this application have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.
- 26 All of the schools and libraries or library consortia listed in Block 4 of this application are covered by:
- a ☐ an individual technology plan for using the services requested in this application; and/or
 - b ☒ higher-level technology plan(s) for using the services requested in this application; or
 - c ☐ no technology plan needed; applying for basic local and long distance telephone service only.
- 27 Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):
- a ☒ technology plan(s) has/have been approved; and/or
 - b ☐ technology plan(s) will be approved by a state or other authorized body; or
 - c ☐ no technology plan needed; applying for basic local and long distance telephone service only.
- 28 I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.
- 29 I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.
- 30 I certify that the entity(ies) I represent has complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.
- 31 I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.
- 32 I recognize that I may be audited pursuant to this application. I will retain for five years any and all worksheets and other records that I rely upon to fill out this application, and, if audited, will make available to the Administrator such records.
- 33 I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34 Signature of authorized person William Britt 35 Date January 16, 2001

36 Printed name of authorized person William Britt

37 Title or position of authorized person Superintendent

38 Telephone number of authorized person: (318) 263 - 9416, ext.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

Entity Number <u>22-22</u>	Applicant's Form Identifier <u>007</u>
Contact Person <u>Danny Gour</u>	Phone Number <u>318-263-9416</u>

NOTICE TO INDIVIDUALS: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order service eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding.

If you owe a past due debt to the Federal government, the taxpayer identification number (such as your social security number) and other information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

**SLD-Form 471
P.O. Box 7026
Lawrence, Kansas 66044-7026**

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

**SLD-Form 471
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
(888) 203-8100**

Attachment 1-TC
Form Identifier 007
Entity Number 139293

ITEM 21 ATTACHMENT
471 Application Number 220710

Blenville Parish
Calculation Worksheet
Telcom Costs

Discount Percentage		86%								
FRN Number	Description	Qty	One Time (Install) Costs	Recurring Costs Monthly	Month Factor	Recurring Costs 2001	Total Cost	ERATE Disc %	School Cost 2001	ERATE Cost 2001
573330	Bell T1 Charges (10 lines)	1	\$0	\$3,580	12	\$42,960	\$42,960	86%	\$0,014	\$36,946
	POTS Analog	1	\$0	\$5,200	12	\$62,400	\$62,400	86%	\$8,736	\$53,664
	Distance Learning Video (2 lines)**	1	\$0	\$1,500	12	\$18,000	\$18,000	86%	\$2,520	\$15,480
Bell South Comm	FRN TOTAL			\$10,280		\$123,360	\$123,360		\$17,270	\$106,090
573338	POTS Analog	1	\$0	\$900	12	\$10,800	\$10,800	86%	\$1,512	\$9,288
Century Tel	FRN TOTAL			\$900		\$10,800	\$10,800		\$1,512	\$9,288
573345	Long Distance	1	\$0	\$1,250	12	\$15,000	\$15,000	86%	\$2,100	\$12,900
AT&T Corp	FRN TOTAL			\$1,250		\$15,000	\$15,000		\$2,100	\$12,900
573352	Long Distance	1	\$0	\$250	12	\$3,000	\$3,000	86%	\$420	\$2,580
Century Tel	FRN TOTAL			\$250		\$3,000	\$3,000		\$420	\$2,580

** Distance Learning Video services dedicated Bell South.net compressed video services - only transmission services - no content

Attachment 2-IA
Form Identifier 007
Entity Number 139293

ITEM 21 ATTACHMENT
471 Application Number 220710

Blenville Parish School District
Calculation Worksheet
Internet Access

FRN Number	Description	Qty	One Time (Install) Costs	Recurring Costs 2001	Month Factor	Recurring Costs 2001	Total Cost	ERATE Disc %	School Cost 2001	ERATE Cost 2001
573377	Dedicated T1 Internet Service for all schools*	1	\$0	\$7,870	12	\$94,440	\$94,440	86%	\$13,222	\$81,218
SEND Technologies	FRN TOTAL					\$94,440	\$94,440		\$13,222	\$81,218

* Internet service email support for all schools; support for school Internet installation, setup and provision for all eligible services required for Internet access.

226869

Entity Number	139293	Applicant's Form Identifier	007-1C
Contact Person	Danny Gour	Phone Number	318-263-9416

Block 6: Certifications and Signature

- 24 The entities listed in Block 4 of this application are eligible for support because they are: (Check one or both.)
- a ☒ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or
 - b ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools, including, but not limited to, elementary and secondary schools, colleges, or universities.
- 25 The eligible schools and libraries listed in Block 4 of this application have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.
- 26 All of the schools and libraries or library consortia listed in Block 4 of this application are covered by:
- a ☐ an individual technology plan for using the services requested in this application; and/or
 - b ☒ higher-level technology plan(s) for using the services requested in this application; or
 - c ☐ no technology plan needed; applying for basic local and long distance telephone service only.
- 27 Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):
- a ☒ technology plan(s) has/have been approved; and/or
 - b ☐ technology plan(s) will be approved by a state or other authorized body; or
 - c ☐ no technology plan needed; applying for basic local and long distance telephone service only.
- 28 I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.
- 29 I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.
- 30 I certify that the entity(ies) I represent has complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.
- 31 I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.
- 32 I recognize that I may be audited pursuant to this application. I will retain for five years any and all worksheets and other records that I rely upon to fill out this application, and, if audited, will make available to the Administrator such records.
- 33 I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34 Signature of authorized person William Britt 35 Date January 16, 2001

36 Printed name of authorized person William Britt

37 Title or position of authorized person: Superintendent

38 Telephone number of authorized person: (318) 263-9416, ext.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

Entity Number	139293	Applicant's Form Identifier	007-10
Contact Person	Danny Gour	Phone Number	318-263-9416

NOTICE TO INDIVIDUALS: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order service eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding.

If you owe a past due debt to the Federal government, the taxpayer identification number (such as your social security number) and other information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

**SLD-Form 471
P.O. Box 7026
Lawrence, Kansas 66044-7026**

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

**SLD-Form 471
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
(888) 203-8100**

Form Identifier 007-IC
Entity Number 139293

471. Application Number 226869

Blenville Parish
Calculation Worksheet
Internal Connections[illegible]



Schools and Libraries Division
Box 125 – Correspondence Unit
80 South Jefferson Road
Whippany, New Jersey 07981

BIENVILLE PARISH SCHOOL DIST
ATTN: Danny Gour
LOCUST & MAPLE STREE
ARCADIA, LA 71001



Universal Service Administrative Company
Schools & Libraries Division

Fund Year 4 FORM 471 CERTIFICATION-REJECTION LETTER

August 2, 2001

DANNY GOUR
BIENVILLE PARISH SCHOOL DIST
LOCUST & MAPLE STREETS
ARCADIA, LA 71001

Re: Applicant's Form Identifier: 007
 Form 471 Application Number:

Dear Applicant:

This letter is your notification that the Certification page of the FCC Form 471, *Services Ordered and Certification Form*, you submitted did not meet Minimum Processing Standards. Therefore we are returning your Form 471 Certification with this letter, *which means that the Schools and Libraries Division (SLD) could not process it*. Here is an explanation of the specific reason(s) your Form 471 Certification did not meet the Minimum Processing Standards:

- The Form 471 Certification submitted is not the correct, OMB-approved FCC Form 471 with a date of September 1999 in the lower right-hand corner of the form.

If you disagree with this decision and you wish to appeal to the SLD, your appeal must be made in writing and received by us within 30 days of issuance of this letter. In your letter of appeal, please include: correct contact information for the appellant, information on the decision you are appealing, the specific application in question, a copy of this letter and an original authorized signature. Appeals sent by fax, e-mail or phone call cannot be processed. Please mail your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125-Correspondence Unit, 80 South Jefferson Road, Whippany, NJ 07981.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC), by sending your notice of appeal to: FCC, Office of the Secretary, 445 12th Street, SW; 12th Street Lobby; Washington, D.C. 20554. Please reference CC Docket Nos. 96-45 and 97-21 on the first page of your appeal. If you choose to file an appeal with the FCC, your appeal must be received no later than 30 days from the date on this letter.

Schools and Libraries Division

Universal Service Administrative Company

Enclosure:

(1) Form 471 Certification



Schools and Libraries Division
Box 125 – Correspondence Unit
80 South Jefferson Road
Whippany, New Jersey 07981

BIENVILLE PARISH SCHOOL DIST
ATTN: DANNY GOUR
LOCUST & MAPLE STREETS
ARCADIA, LA 71001



Universal Service Administrative Company
Schools & Libraries Division

Fund Year 4 FORM 471 CERTIFICATION-REJECTION LETTER

August 2, 2001

Danny Gour
BIENVILLE PARISH SCHOOL DIST
LOCUST & MAPLE STREE
ARCADIA, LA 71001

Re: Applicant's Form Identifier: 007-IC
Form 471 Application Number: 226869

Dear Applicant:

This letter is your notification that the Certification page of the FCC Form 471, *Services Ordered and Certification Form*, you submitted did not meet Minimum Processing Standards. Therefore we are returning your Form 471 Certification with this letter, *which means that the Schools and Libraries Division (SLD) could not process it*. Here is an explanation of the specific reason(s) your Form 471 Certification did not meet the Minimum Processing Standards:

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Schools and Libraries Division

Universal Service Administrative Company

Enclosure:

(1) Form 471 Certification

Apo # 220710

NEC71031-18-0105302154

Entity Number <u>130903</u>	FY <u>04</u>	007
Contact Person <u>Danny Goum</u>	Phone Number <u>318-263-9416</u>	

Block 6: Certifications and Signature

- 24 The applicant is eligible for support because it includes: (Check one or both.)
- a ☒ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or
 - b ☐ libraries or library consortia eligible for assistance from a state library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools, including, but not limited to, elementary and secondary schools, colleges, or universities.
- 25 The schools and libraries I represent have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.
- 26 All of the individual schools, libraries, and library consortia listed in Block 4 are covered by:
- * a ☐ an individual technology plan for using the services requested in this application; and/or
 - b ☒ higher-level technology plan(s) for using the services requested in this application; or
 - c ☐ no technology plan needed; applying for basic local and long distance telephone service only
- 27 Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):
- a ☒ technology plan(s) has/have been approved.
 - b ☐ technology plan(s) will be approved by a state or other authorized body.
 - c ☐ no technology plan needed; applying for basic local and long distance telephone service only.
- 28 I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurement of services for which support is being sought.
- 29 I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.
- 30 I certify that the entity(ies) I represent has compiled with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments.
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- 33 I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34 Signature <u>William Britt</u>	35 Date <u>01-16-2001</u>
36 Printed name of authorized person <u>William Britt</u>	
37 Title or position of authorized person <u>Superintendent</u>	
38 Telephone number of authorized person: <u>(318) 263-9416</u> ext. <u> </u>	
Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.	

471 App#220710
 Bienville Parish Schools

Case # 45942

Attachment 1-TC
Form Identifier 007
Entity Number 139293

ITEM 21 ATTACHMENT
471 Application Number 220710

Blenville Parish
Calculation Worksheet
Telcom Costs

Discount Percentage		86%								
FRN Number	Description	Qty	One Time (Install) Costs	Recurring Costs Monthly	Month Factor	Recurring Costs 2001	Total Cost	ERATE Disc %	School Cost 2001	ERATE Cost 2001
573330	Bell T1 Charges (10 lines)	1	\$0	\$3,580	12	\$42,960	\$42,960	86%	\$6,014	\$36,946
	POTS Analog	1	\$0	\$5,200	12	\$62,400	\$62,400	86%	\$8,736	\$53,664
	Distance Learning Video (2 lines)**	1	\$0	\$1,500	12	\$18,000	\$18,000	86%	\$2,520	\$15,480
Bell South Comm	FRN TOTAL			\$10,280		\$123,360	\$123,360		\$17,270	\$106,090
573338	POTS Analog	1	\$0	\$900	12	\$10,800	\$10,800	86%	\$1,512	\$9,288
Century Tel	FRN TOTAL			\$900		\$10,800	\$10,800		\$1,512	\$9,288
573345	Long Distance	1	\$0	\$1,250	12	\$15,000	\$15,000	86%	\$2,100	\$12,900
AT&T Corp	FRN TOTAL			\$1,250		\$15,000	\$15,000		\$2,100	\$12,900
573352	Long Distance	1	\$0	\$250	12	\$3,000	\$3,000	86%	\$420	\$2,580
Century Tel	FRN TOTAL			\$250		\$3,000	\$3,000		\$420	\$2,580

** Distance Learning Video services dedicated Bell South.net compressed video services - only transmission services - no content

Attachment 2-IA
Form Identifier 007
Entity Number 139293

ITEM 21 ATTACHMENT
471 Application Number 220710

Blenville Parish School District
Calculation Worksheet
Internet Access

FRN Number	Description	Qty	One Time (Install) Costs	Recurring Costs 2001	Month Factor	Recurring Costs 2001	Total Cost	ERATE Disc %	School Cost 2001	ERATE Cost 2001
573377	Dedicated T1 Internet Service for all schools*	1	\$0	\$7,870	12	\$94,440	\$94,440	86%	\$13,222	\$81,218
SEND Technologies	FRN TOTAL					\$94,440	\$94,440		\$13,222	\$81,218

* Internet service email support for all schools; support for school Internet Installation, setup and provision for all eligible services required for Internet access.

Entity Number 129203 Applicant's Form Identifier 007-IC
 Contact Person Danny Gour Phone Number 318-263-9416

Block 6: Certifications and Signature

24 The applicant is eligible for support because it includes: (Check one or both.)

- a ☒ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1985, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or
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25 The schools and libraries I represent have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.

26 All of the individual schools, libraries, and library consortia listed in Block 4 are covered by:

- a ☐ an individual technology plan for using the services requested in this application; and/or
- b ☒ higher-level technology plan(s) for using the services requested in this application; or
- c ☐ no technology plan needed; applying for basic local and long distance telephone service only

27 States of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

- a ☒ technology plan(s) has/have been approved.
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29 I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

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33 I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

34 Signature William Britt

35 Date 01/16/2001

36 Printed name of authorized person William Britt

37 Title or position of authorized person Superintendent

38 Telephone number of authorized person: (318) 263-9416 ext.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 502(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Duplicate Certification

Page 5 of 6

Previous Submission

NOT DATED

471 APP# 226869

Blenville Parish Schools

FCC Form 471 - September 1998

Case # 45949

Form Identifier 007-IC
Entity Number 139293

471 Application Number 226869

Calculation Worksheet Internal Connections

[illegible]